

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

Honorable Karen M.  
Williams, Magistrate Judge

**NOTICE OF THE ZHP PARTIES' MOTION FOR PROTECTIVE ORDER  
REGARDING PLAINTIFFS' DEPOSITIONS OF CHINESE NATIONAL  
WITNESSES**

To: Adam M. Slater, Esquire  
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PLEASE TAKE NOTICE that on a date to that on April 19, 2021, or as soon thereafter as counsel may be heard, the ZHP Parties, by and through their undersigned counsel, shall move before the Honorable Robert B. Kugler, the Honorable Karen M. Williams, and the Honorable Special Master Thomas I. Vanaskie, for an ORDER allowing ZHP Party witnesses who do not speak English to refrain from answering questions based on documents written in English and not accompanied with an accurate and complete translation in Chinese.

April 19, 2021

Respectfully submitted,

/s/ Seth A. Goldberg

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